

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ALL CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO QUASH THE CROSS
NOTICE OF VIDEO DEPOSITION OF CHUCK AUSTIN**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively "Ethicon") hereby oppose Plaintiffs' Motion to Quash the Cross Notice of Video Deposition of Chuck Austin [Docket No. 1658]. Nevertheless, Ethicon will not burden the Court with a detailed substantive response, as there is no immediate dispute warranting resolution of Plaintiff's motion in light of the fact that the deposition has already taken place and Plaintiffs are not presently seeking another deposition of Mr. Austin in the MDL. However, Ethicon reserves its right to file a more detailed submission to the extent a concrete dispute later arises with respect to the position Plaintiffs take in their motion.

Respectfully submitted,

ETHICON, INC. AND
JOHNSON & JOHNSON

/s/ Christy D. Jones

Christy D. Jones
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010

Ridgeland, MS 39158-6010
(601) 985-4523

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)
Thomas Combs & Spann, PLLC
300 Summers Street, Suite 1380
P.O. Box 3824
Charleston, WV 25338-3824
(304) 414-1800

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CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on August 25, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

Christy D. Jones
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523
christy.jones@butlersnow.com